

AO91 (Rev. 12/03) Criminal Complaint

AUSA

**UNITED STATES DISTRICT COURT**United States District Court  
Southern District of Texas  
FILED

Southern District Of Texas Brownsville Division

JUL 18 2019

**UNITED STATES OF AMERICA**

vs.

**CRIMINAL COMPLAINT**

David J. Bradley, Clerk of Court

Jeffrey Allen II HINRICHS  
A203 671 040 United States  
Jesus Antonio VEGA  
A203 671 039 United StatesCase Number: B-19- *MJ-744*

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about July 16, 2019 in Cameron County, inthe Southern District Of Texas defendant(s)

knowingly, willfully, and in reckless disregard of the fact that three undocumented alien(s) had entered the United States in violation of law and remained in the United States in violation of law, did transport and move said alien(s) by means of a motor vehicle with intent to further their unlawful presence,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

On July 16, 2019, Border Patrol Agents assigned to the Harlingen Station received a request for assistance from the Harlingen, TX Police Department (H.P.D.) at a convenience store in Combes, Texas.

Upon arrival, HPD officers informed Agents they stopped a white Dodge Challenger for driving erratically failing to maintain use on a single marked designated lane. The Officer identified the driver Jeffrey Allen HINRICHS and the front passenger Jesus Antonio VEGA as United States Citizens but was unable to properly identify the remaining three passengers. Officer then proceeded to request assistance from the United States Border Patrol. Agents arrived on scene and conducted an immigration inspection on all subjects encountered inside the Dodge Challenger. Agents confirmed the status of both the driver and the front passenger as United States Citizens. However, the remaining three passengers were illegally present in the United States. All 5 subjects were arrested and transported to the Harlingen Border Patrol Station for processing and final disposition.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Fayett, Bernardo I. Border Patrol Agent

Printed Name of Complainant

Sworn to before me and signed in my presence,

July 18, 2019

Date

at

Brownsville, Texas

City/State

Ronald G. Morgan

Name of Judge

U.S. Magistrate Judge

Title of Judge

Signature of Judge

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA**

**CRIMINAL COMPLAINT**

**V.**

Jeffrey Allen II HINRICHS  
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Jesus Antonio VEGA  
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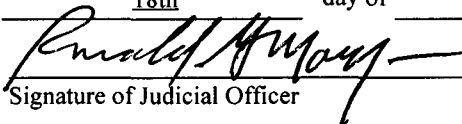
Once at the Harlingen Station, Agents initiated a smuggling investigation. Agents discovered through, photo lineups, and testimony provided by two individual subjects serving as Material Witnesses, that Jeffrey Allen HINRICHS and Jesus Antonio Vega were knowingly transporting undocumented aliens for monetary gain.

SUBSCRIBED and SWORN to before me on

18th

day of

July, 2019

  
Signature of Judicial Officer

  
Signature of Complainant